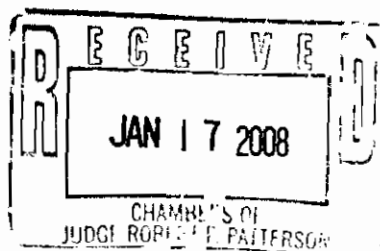


PULLMAN & COMLEY, LLC
ATTORNEYS AT LAW

MEMO ENDORSED

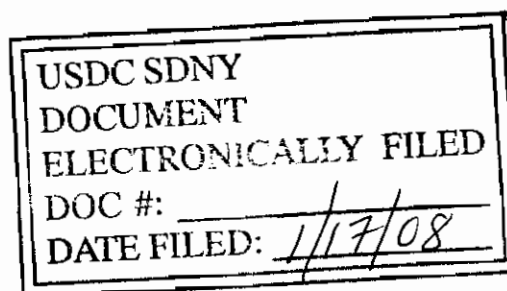


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January 16, 2008

Hon. Robert P. Patterson
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St., Room 2550
New York, NY 10007



Re: *United States of America v. Nue Vuksanaj*, Docket Number: 07 CR 00943 (RPP)

Dear Judge Patterson:

This letter is submitted to request a modification to the motions schedule in the above-captioned case.

At the present time, defense motions are due on January 18, the government's responses are due on January 25, and a hearing or oral argument on pending motions is scheduled for January 30, 2008. The matter is scheduled for trial on April 7, 2008, although this has not been established as a firm date.

After consulting with Assistant United States Massey, and with his consent, the defendant proposes the following schedule: defense motions by on or before February 18; government's response by February 28; and a hearing or oral argument on pending motions in March. Mr. Massey has a prior commitment and is not available from March 3 to 11. I am likewise not available from March 17 through 28. This proposed schedule may permit the parties to proceed to trial on the Information later in April or early May.

This is my first request for a modification to the motions schedule, and I believe that it is reasonable. I first filed a Notice of Appearance on or about December 18, 2007, and made my first appearance before the Court on January 4, 2008. Pursuant to a Protective Order entered by the Court, consensually monitored and recorded conversations, draft transcripts and summaries of those conversations were not disclosed to the defense until January 10, 2008. The draft transcripts and summaries of conversations are extensive. Many of the recorded conversations are in Albanian. The undersigned, who does not speak or understand Albanian, is still reviewing and assessing their import.

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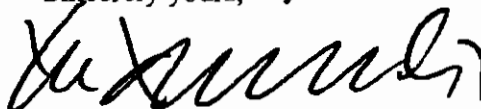
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The parties are exercising due diligence in preparing for trial. Counsel for the defendant and for the United States are working through discovery requests which may obviate the need for some motions, and the parties are arranging for the defense to inspect physical evidence seized during the investigation.

I respectfully submit that the ends of justice served by granting the requested modification to the motions schedule and change in hearing date outweigh the best interests of the public and the defendant in a speedy trial. Further, failure to grant the requested continuance would deny the defendant reasonable time to review discovery provided to date and would deny counsel reasonable time necessary for effective preparation. It would be appropriate, therefore, to toll from computation under the Speedy Trial Act, the period of time from January 30 to the date set by the Court for a hearing or oral argument on pending motions.

I thank you in advance for your consideration of the relief requested.

Sincerely yours,



ALEX V. HERNANDEZ, Esq.
PULLMAN & COMLEY, LLC

cc: David Massey, Assistant United States Attorney

Stamford/1.1/AHERNANDEZ/337190v1

*Application granted
argument on hearing on
3/12/08 at 4 P.M.
So ordered
Ruth Plattner
USD
1/17/08*